

PHILLIP A. TALBERT
United States Attorney
CHRISTINA McCALL
ROGER YANG
Assistant United States Attorneys
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRADLEY EARL REGER,

Defendant.

CASE NO. 2:23-CR-0177 TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: May 23, 2024
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on May 23, 2024.
2. By this stipulation, defendant now moves to continue the status conference until June 6, 2024, at 9:30 a.m. and to exclude time between May 23, 2024, and June 6, 2024, at 9:30 a.m. under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes over 19,000 pages/items of regular discovery and over 348,000 pages/items of protected discovery. Those items include: business records; investigative reports; recorded interviews of

1 alleged victims and potential witnesses; photographs; search warrant documents; Facebook and
2 Google search warrant returns; travel records; and thousands of pages of scanned papers from
3 search warrant executions.

4 b) A continuance is requested because counsel for both parties need additional time
5 for effective preparation, to conduct legal research and further investigation into the alleged
6 crimes.

7 c) Counsel for defendant believes the failure to grant a continuance in this case
8 would deny defense counsel reasonable time necessary for effective preparation, taking into
9 account the exercise of due diligence.

10 d) The government joins in the request for the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendant in a trial within the
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of May 23, 2024 to June 6, 2024, at
16 9:30 a.m., inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
17 Code T4] because it results from a continuance granted by the Court at defendant's request on
18 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
19 best interest of the public and the defendant in a speedy trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
22 must commence.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 ///

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 IT IS SO STIPULATED.

2
3
4 Dated: May 10, 2024

PHILLIP A. TALBERT
United States Attorney

5
6 /s/ CHRISTINA McCALL
CHRISTINA McCALL
7 ROGER YANG
Assistant United States Attorneys

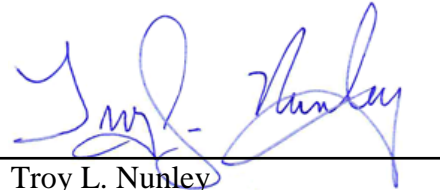
8
9 Dated: May 10, 2024

/s/ TASHA CHALFANT
10 KRESTA DALY
TASHA CHALFANT
11 Counsel for Defendant
Bradley Earl Reger

12
13
14 **ORDER**

15 The Court has read and considered the parties' Stipulation. The Court ORDERS that the status
16 conference be continued to June 6, 2024, at 9:30 a.m.. The Court hereby finds that the Stipulation,
17 which the Court incorporates by reference into this Order, demonstrates facts that provide a basis to
18 exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
19 Time is excluded under the Speedy Trial Act between May 23, 2024, and June 6, 2024, at 9:30 a.m..

20
21 Dated: May 10, 2024

22
23 
Troy L. Nunley
United States District Judge